REFORE THE

Federal Communications Commission

WASHINGTON, D. C. 20554

RECEIVED

JUL-1.9 1993
FEDERAL COMMUNICATIONS COMMISSION

In the Matter of

Amendment of Part 90 of the Commission's Rules to Facilitate Future Development of SMR Systems in the 800 MHz Frequency Band

)
)
)
)
PR Docket No. 93-144

To: The Commission

COMMENTS OF APCO

The Associate Public-Safety Communications Officers,
Inc. ("APCO") hereby submits the following comments in
response to the Commission's Notice of Proposed Rulemaking
in the above-captioned proceeding.

APCO is the nation's oldest and largest public safety communications organization representing the interests of all elements of the public safety land mobile radio community. APCO has nearly 10,000 members involved in the management and operation of radio communications systems for police, fire, state and local government, emergency medical, forestry conservation, highway maintenance, and other public safety services. APCO is the FCC-certified Frequency Coordinator for all Part 90 Police, Local Government and 420 MHz and 800 MHz Public Safety channels.

The Commission proposes to create a new type of widearea SMR license known as "Expanded Mobile Service Provider" or "EMSP", which would be limited to SMR Category channels

> No. of Copies rec'd_ List A B C D E

under Section 90.617 (table 4A). Notice at ¶32. However, the Commission also seeks comment as to whether it should permit General Category channels to be included into EMSP licenses. APCO would oppose such an expansion as it would lead to a greater danger of interference to public safety operations in the General Category channels.

Many public safety licensees in the 800 MHz General Category have experienced interference from the increasing number of SMR mobile units roaming at and beyond the edges of SMR service areas. Indeed, SMR units using "talk-around" mode often wander well beyond SMR service areas.

Interference occurs in these cases to nearby public safety operations that, unfortunately, are not subject to FCC

interference protection other than from the CMD bace

§90.621(g). However, Public Safety Pool frequencies are subject to intercategory sharing by eligibles in the Industrial/Land Transportation and Business categories, which are subject to sharing by SMRs. The result is likely to be added pressure for intercategory sharing of Public Safety frequencies by Business and Industrial/Land Transportation entities who are pushed out of their own category, creating shortages for public safety users who are handicapped by funding and implementation delays.

CONCLUSION

Therefore, for the reasons discussed above, APCO supports the FCC's proposal to limit EMSP licenses to SMR Category Channels, and to limit traditional SMR intercategory sharing to the General Category.

Respectfully submitted,

ASSOCIATED PUBLIC-SAFETY COMMUNICATIONS OFFICERS, INC.

By:

Ronnie Rand

Executive Director 2040 S. Ridgewood Ave. South Daytona, FL 32119

(904) 322-2500

Of Counsel:

John D. Jane